

EXHIBIT “C”

IN THE UNITED STATES DISTRICT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

K.H. AND S.H., AS NEXT FRIENDS
OF R.H., A MINOR,

Plaintiffs,

V.

GRAEME HOWE; CAMP STEWART FOR
BOYS, INC.; AND AMERICAN INSTITUTE
FOR FOREIGN STUDY, INC. D/B/A
CAMP AMERICA

Defendants.

[illegible]

NO. 5-19-CV-01412-JKP

**PLAINTIFF K.H.'S FIRST SUPPLEMENTAL OBJECTIONS AND ANSWERS TO
FIRST SET OF INTERROGATORIES FROM DEFENDANT GRAEME HOWE**

TO: Graeme Howe, by and through his attorneys of record, C. Dunham Biles, Daniel J. Madden, K. Patrick Babb, Fox Rothschild LLP, Sant Ann Court, 2501 N. Harwood St., Ste 1800, Dallas, Texas 75201.

COMES NOW, Plaintiff K.H., and serves his First Supplemental Objections and Answers to First Set of Interrogatories from Defendant Graeme Howe.

Respectfully submitted,

SAWICKI LAW

/s/ Andrew A. Jones

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been delivered via e-mail, U.S. Postal Service, certified mail/ return receipt requested, hand delivery and/or facsimile to all counsel on this 26th day of March, 2021.

/s/ Andrew A. Jones

ANDREW A. JONES

**PLAINTIFF K.H.'S FIRST SUPPLEMENTAL OBJECTIONS AND ANSWERS TO
FIRST SET OF INTERROGATORIES FROM DEFENDANT GRAEME HOWE**

DEFINITIONS/ INSTRUCTIONS:

Plaintiff objects to the instructions and definitions as overly broad.

INTERROGATORY NO. 1: Identify all social media accounts, including but not limited to Facebook, Twitter, Instagram, YouTube, WhatsApp, WeChat, Tumblr, Reddit, LinkedIn, Snapchat, Pinterest, Twitch, Tik Tok, Flickr, Yelp, Myspace, Imgur, or Vimeo, operated, owned, or otherwise used by you or on your behalf since June 2011, and state for each the user name, password, and other credentials used to access the account.

ANSWER:

Plaintiff objects to this Interrogatory as overly broad and not properly limited in time and scope. Plaintiff objects to this Interrogatory as a violation of Plaintiff's personal privacy. Plaintiff objects to this Interrogatory as exceeding the scope of permissible discovery. Fed. R. Civ. P. 26(b)(1). Plaintiff objects to this Interrogatory as harassing.

Subject to and without waiving said objections, to the best of Plaintiff's knowledge, these are all of his social media:

LinkedIn

User Name: k h

Yelp.com

User Name: K H.

INTERROGATORY NO. 2: Identify all e-mail accounts operated, owned, or otherwise used by you or on your behalf since June 2011, and state for each the password and other credentials used to access the account.

ANSWER:

Plaintiff objects to this Interrogatory as overly broad and not properly limited in time and scope. Plaintiff objects to this Interrogatory as a violation of Plaintiff's personal privacy. Plaintiff objects to this Interrogatory as exceeding the scope of permissible discovery. Fed. R. Civ. P. 26(b)(1). Plaintiff objects to this Interrogatory as harassing.

Subject to and without waiving said objections, Plaintiff may be contacted through Counsel.

INTERROGATORY NO. 3: Identify all telephone numbers operated, owned, or otherwise used by you or on your behalf since June 2011.

ANSWER:

Plaintiff objects to this Interrogatory as overly broad and not properly limited in time and scope. Plaintiff objects to this Interrogatory as a violation of Plaintiff's personal privacy. Plaintiff objects to this Interrogatory as exceeding the scope of permissible discovery. Fed. R. Civ. P. 26(b)(1). Plaintiff objects to this Interrogatory as harassing.

Subject to and without waiving said objections, Plaintiff may be contacted through Counsel.

INTERROGATORY NO. 4: Identify all instances in which law enforcement were contacted in regard to K.H., S.H., and/or R.H. since 2010 to the present.

ANSWER:

Plaintiffs object to this Interrogatory as overly broad and not properly limited in time and scope. Plaintiffs object to this Interrogatory as harassing and a violation of Plaintiffs' personal privacy. Plaintiffs object to this Interrogatory as seeking information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiffs object to this Interrogatory as not proportional to the needs of this case and outside the scope of Fed. R. Civ. P. 26(b)(1). Plaintiffs object to this Interrogatory as violative of Fed. R. Evid. 404 and 608.

Subject to and without waiving said objections, please see records and videos from Kerr County Sheriff's office (RH000001-001610, 001711-001868), and all depositions taken in this matter, all of which are incorporated herein by reference.